

Title I, Part A Federal Funding Conference 2017

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Who's in the Audience?

- I'm not working on Title I yet, but I will have Title I responsibilities next year.
- 2016-17 was my first year working with Title I and WISEgrants.
- I've been working on Title I for more than a year but less than three years.
- I've been working on Title I for more than three years.



Learning Objectives

- Provide an overview of the laws and statutes regulating the funds.
- Explain how Title I, Part A, funds are allocated to districts.
- Demonstrate how the funds are distributed to eligible schools.
- Discuss other issues regarding fiscal compliance.
- Highlight ESSA changes.



ESEA and Title I, Part A

- **Elementary and Secondary Education Act (ESEA) of 1965.**
- **Title I, Part A funds are targeted to high-poverty school districts and provide supplementary education to students who are educationally disadvantaged or at risk of failing to meet the state standards.**



Every Student Succeeds Act (ESSA)

- ESEA was reauthorized as Every Student Succeeds Act (ESSA) on December 10, 2015.
- Consolidated Appropriations Act, 2016 (signed on December 18, 2015).
- For the current year, 2016-2017, Title I has operated under the past waiver to No Child Left Behind with very few changes.



Every Student Succeeds Act

Other sessions to attend:

- **ESSA's New Requirements for Equitable Participation for Private Schools.**
- **Overview of all of the Local Education Agency Requirements for Equitable Participation for Private Schools under ESSA.**
- **Understanding the difference between Title I Schoolwide and Targeted Assistance Programs.**



Every Student Succeeds Act

- **DPI is awaiting guidance from the U.S. Department of Education for implementation regulations:**
 - fiscal regulations
 - state plans
 - supplement not supplant
 - school improvement transition
- **DPI has and will continue to update the website with technical assistance and FAQs regarding the transition to ESSA.**



ESSA Student Succeeds Act (ESSA)

ESSA Planning Timeline

Continue Assembling State Plan



Distribution of Funds

U.S. Department of Education

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graph TD; A[U.S. Department of Education] --> B[WI Department of Public Instruction (SEA-State Education Agency)]; B --> C[Local School District (LEA- Local Education Agency)]; C --> D[Title I School];
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The diagram illustrates the flow of funds through four levels: U.S. Department of Education (dark blue), WI Department of Public Instruction (SEA-State Education Agency) (teal), Local School District (LEA- Local Education Agency) (green), and Title I School (orange). Each level is connected to the next by a downward-pointing arrow.

WI Department of Public Instruction
(SEA-State Education Agency)

Local School District
(LEA- Local Education Agency)

Title I School

Allocation of Funds to LEAs

The formula is based on:

- the state's average per pupil expenditure, and
- the LEA's count of children from low-income families.

US Census Bureau
Small Area Income and Poverty Estimates (SAIPE)
are used to determine poverty.



Allocation of Funds to LEAs

	Basic	Targeted	Financial Incentive	Concentration
15%	X	X	X	X
14.99%	X	X	X	
5.00%	X	X	X	
4.99%	X			
2%	X			

Title I Equitable Services for Private Schools

- Title I services are designed to meet the needs of private school students as determined by the consultation.
- Title I services provided by the public school must supplement the private school's educational services (similar to a targeted assistance school).
- Private school per pupil amounts are determined based on the number of low income private school students residing in served public school attendance areas.



Private School Equitable Participation

- In ESSA, the proportional share for private school equitable participation is based on the LEA's total allocation and must be determined before reservations.
- LEAs typically use the previous year's student counts in served attendance areas to determine the allocation.



Private School Equitable Participation

Example: \$100,000 2017-18 Allocation

	Public	Private
Low income students in served attendance areas from 2016-17	90	10
Percentage of total low income students in served attendance areas from 2016-17	90%	10%
Proportional share before reservations	\$90,000	\$10,000

Reservations

- Title I gives the option for the LEA to take funds “off the top” of their allocation for various reasons before making per pupil amount allocations to buildings.
- This is at the discretion of the LEA – some choose to take none.
- **Except** the Parent Involvement reservation:
 - Required if the allocation is greater than \$500,000.
 - One percent must be reserved for parent involvement activities.



Reservations

- **Other Services:** Including, but not limited to, centralized services, professional development, services to eligible students who do not attend Title I schools (i.e. homeless or migrant students), additional resources for Title I Focus and Priority Schools, etc.
- **Administrative Costs:** Approved indirect rate + up to 10 percent of the allocation for direct administrative costs.
- **Starting next year public and private reservations will be taken separately.**



Reservations

Plan Reservations

Instructions 

Reservations Subject to Equitable Participation

The amount of reservations to be used for equitable participation in private schools is automatically calculated on the Private School Equitable Participation Summary Report and may be viewed after eligible school allocations amounts are determined.

Parent Involvement (minimum 1% is required if the Title I allocation is over \$500,000. 95% of the 1% set aside must be distributed to schools)	\$5,000.00
Professional Development	\$12,000.00
Centralized Services	\$0.00
Total Reservations Subject to Equitable Participation	\$17,000.00

Reservations NOT Subject to Equitable Participation

Administration (Include costs to administer and coordinate Title I services for both the public and private schools.)	\$0.00
Homeless	\$5,000.00
Migrant	\$0.00
Neglected and Delinquent	\$0.00
Preschool	\$3,000.00
Private School Carryover	\$0.00
Estimated Indirect Costs Indirect Estimate Calculator	\$0.00
Total Reservations NOT Subject to Equitable Participation	\$8,000.00

Title I School Eligibility

- **Based on the number of children in poverty in an attendance area (school).**
- **Includes children who attend private schools both inside and outside of the district and live in a school's attendance area.**
- **Enrollment count for all students must be done on the same date.**



Title I School Eligibility

LEAs may use one of the following measures:

- census data,
- National School Lunch Act data,
- W-2 data,
- Medicaid data, or
- a composite of the above measures.

Private schools do not have to use the same measures as the LEAs, but should use comparable measures.



Title I Enrollment Calculation

BLUE SCHOOL

Public Enrollment
447 Students

+

Private Enrollment
84 Students

=

Total Enrollment
531 Students

Low-Income Public
218 Students

+

Low-Income
Private
8 Students

=

Low-Income Total
226 Students

Low-Income Total
226 Students

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Total Enrollment
531 Students

=

Percent Low-
Income
42.56%

Title I Enrollment Calculation

RED SCHOOL

Public Enrollment
307 Students

+

Private Enrollment
41 Students

=

Total Enrollment
348 Students

Low-Income Public
151 Students

+

Low-Income
Private
14 Students

=

Low-Income Total
165 Students

Low-Income Total
165 Students

÷

Total Enrollment
348 Students

=

Percent Low-
Income
47.41%

Title I Enrollment Calculation

GREEN SCHOOL

Public Enrollment
180 Students

+

Private Enrollment
7 Students

=

Total Enrollment
187 Students

Low-Income Public
76 Students

+

Low-Income
Private
2 Students

=

Low-Income Total
78 Students

Low-Income Total
78 Students

÷

Total Enrollment
187 Students

=

Percent Low-
Income
41.71%

Options to Rank Schools

Title I School Eligibility Ranking

LEAs serve schools in rank order based on poverty data.

LEAs must service all schools with a poverty rate of 75 percent or higher.

- An LEA's poverty average
- Grade span grouping using the LEA's poverty average
- Grade span grouping using the grade span's poverty average
- 35 percent rule
- Fewer than 1,000 students exemption
- Only one school per grade span exemption

New ESSA High School Ranking Exception

An LEA may serve a high school with poverty level between 50 and 75 percent before it serves other schools with a poverty at or below 75 percent.

ESEA section 1113(a)(3)(B).



Determining Per Pupil Amounts

- Per pupil amounts are determined for *each* public school.
- The same per pupil amount can be allocated for each eligible school:
 - Lower per pupil amounts may be allocated for lower poverty schools.
 - A school *may not* receive a lower per pupil amount than another school that falls below it in rank order.



Determining Per Pupil Amounts

Attendance Area (School)	Grade Span	Percent Low Income	Per Pupil Amount	Attendance Area Allocation
Red School 165 low income students	K-5	47.41%	\$502	\$82,830
Blue School 226 low income students	K-5	42.56%	\$501	\$113,226
Green School 78 low income students	K-5	41.71%	\$501	\$39,078

Ranking and Per Pupil Amounts

TI School Eligibility

Instructions ▲

Ranking Options

- District Poverty Average 48.75 % 35% Rule Grade Span Grouping – Using District Poverty Average
- Grade Span Grouping – Using Grade Span Poverty Average Fewer than 1,000 Students Exemption One School per Grade Span Exemption

Total Funds Available For Targeting to Eligible Schools

Total Funds Available - Total Reservations

\$592,524.00

School Code	Attendance Area (School Name)	Grade Span	Percent Low Income	125% PPA Flexibility	Exception Name	Eligibility	Program Type	Per Pupil Amount	Public Allocation	Private Allocation	Total Allocation
0080	Lawrence-Lawson El	KG-03	65.90 %	No		E	Schoolwide	\$612.00	\$105,264.00	\$3,672.00	\$108,936.00
0410	Sparta High Point Sch	07-12	60.61 %	No		E	Schoolwide	\$612.00	\$12,240.00	\$0.00	\$12,240.00
0110	Maplewood El	KG-03	58.89 %	No		E	Schoolwide	\$612.00	\$64,872.00	\$3,672.00	\$68,544.00
0800	SAILS Sparta Alt Indep Lrn Sch	09-12	53.57 %	No		E	Schoolwide	\$612.00	\$9,180.00	\$0.00	\$9,180.00
0120	Southside El	KG-03	52.92 %	No		E	Schoolwide	\$612.00	\$83,232.00	\$2,448.00	\$85,680.00

High School ESSA Example

School	Poverty Percentage	Per Pupil Amount
North High School	51%	\$600
West Elementary School	74%	\$550
South Middle School	52%	\$500

School	Poverty Percentage	Per Pupil Amount
West Elementary School	76%	\$600
North High School	51%	\$550
South Middle School	52%	\$500



Private School Per Pupil Amounts

- Private school per pupil amounts no longer tied to a specific attendance area.
- Determined separately from the public schools and done after reservations are taken.
- Example:

\$13,000 Private school proportional share

\$1,000 Private school reservations

\$12,000 / 20 low income private students in served attendance areas = \$600 private per pupil amount *regardless of which private school they attend or which served attendance area they reside in.*

Private School	Low Income Enrollment 17-18 Served Attendance Areas	Title I-A Instructional Amount
Private School A	8	\$4,800
Private School B	10	\$6,000
Private School C	2	\$1,200

Per Pupil Amounts

Public Schools

\$502 Per Pupil Amount

\$501 Per Pupil Amount

\$501 Per Pupil Amount

Private Schools

\$600 PPA

\$600 PPA

\$600 PPA

\$600 PPA

\$600 PPA

Divided Equally Among
Number of Low Income
Students After
Reservations are Taken

Divided Among Schools According to Ranking



Targeted & Schoolwide Comparison

Targeted Assistance Program

- Supplemental instructional services
- Specific students who have been identified as failing
 - Not necessarily low-income students

Schoolwide Program

- Comprehensive Strategies
- ALL STUDENTS
- Eligible schools

Common Allowable Costs

Budget items must address needs identified in the district's annual needs assessment. Common allowable costs include:

- salary and fringe benefits of staff providing Title I services such as teachers and paraprofessionals,
- contracted costs of staff providing Title I services,
- instructional media and supplies, and
- training and travel for staff providing Title I services.



Is it Allowed?

- This is the most common questions LEAs ask DPI.
- This is the most common question DPI consultants ask each other.

The answer is:

It depends.



Supplement not Supplant

ESEA as amended by ESSA

SEC. 1118. [20 U.S.C. 6321] FISCAL REQUIREMENTS.

(b) FEDERAL FUNDS TO SUPPLEMENT, NOT SUPPLANT, NON- FEDERAL FUNDS.—

- (1) IN GENERAL.—**A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.
- (2) COMPLIANCE.—**To demonstrate compliance with paragraph (1), a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part.

Awaiting
guidance!



Other Financial Requirements

Maintenance of Effort

- To demonstrate state/local effort is maintained

Comparability

- To demonstrate that LEAs provide comparable state/local resources to Title I schools and Non-Title I schools

Time and Effort

- To demonstrate that staff charged to the federal program actually worked on the federal program



Grant Period & Carryover Policy

Fiscal Year: July 1 to June 30

LEA's Allocation*

Less than \$50,000

- There is no limit on the amount of funds that can be carried over from year to year.

LEA's Allocation*

Greater than \$50,000

- LEAs may carryover 15 percent of the total allocation.
- LEAs must apply for a waiver to carryover more than 15 percent of the total allocation. This is only allowed once every three years.

*Allocation plus any funds transferred to TI-A



Claim Process

- **Use WISEgrants to make claims online.**
 - Claims are formatted to the PI-1086
 - Claim forms will reflect the most recently approved budget.
- **Submit electronic claims at least quarterly** (*encouraged*).
- **In WISEgrants a District Authorizer must sign off on each claim before it is sent to the DPI Grant Accountant.**



Contacts

Title I Education Consultant Directory

<http://dpi.wi.gov/title-i/consultant-directory>

Title I Network Coordinators

<http://dpi.wi.gov/title-i/network/contacts>

